

## REMARKS

The Office Action mailed February 20, 1998 (paper #5), in parent application 08/665,404 allowed claims 1-33. This preliminary amendment cancels claims 1-33, amends claim 34, and adds nineteen new claims 35-53. Claims 34-53 are now pending in this continuing Application. No new matter is being added. In view of the following remarks, Applicant respectfully requests reconsideration of the rejections and further examination of the continuing Application as amended.

### Rejection under 35 U.S.C. § 102(b)

The Examiner rejected claim 34 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,779,080 by Coughlin, et al., *Electronic Information Display Systems* (hereinafter Coughlin).

In paragraph 4, page 3 of the Office Action, the Examiner stated that "Coughlin et al teach[es] a computer data storage medium storing a correspondence table . . . the correspondence table comprising: a plurality of correspondence sets, each correspondence set including . . . a correspondence phoneme entry representing the pronunciation of the correspondence text entry and a correspondence symbol identifying the correspondence set (his address data[)]". Applicant respectfully traverses. As new claims 35-53 are similar in scope to claim 34, no new search should be required and the following arguments anticipate similar rejections to claims 35-53.

Claim 34 (as amended) recites "a correspondence phoneme entry representing the pronunciation of the correspondence text entry . . . ." This limitation is supported in the Specification on page 10, lines 25-26 as follows: "a phoneme entry expressing at least one phonetic sound." Further, the Specification reflects that "although the invention has been described using phonemes, other alternative means for *representing pronunciation of text* are possible . . ." (page 22, lines 8-10, emphasis added).

In contrast, Coughlin teaches a dictionary "contained in [a] compact disc . . . for each of the text words that make up [a] dictionary. . . . For each text word, the set of data comprises . . . a sound portion *giving an audible pronunciation.*" (Col. 5 lines 22-26, emphasis added). In addition, Coughlin teaches an area "for selecting a sound pronunciation of the text word." (Col. 6, lines 40-41). Thus, Coughlin includes an actual audio pronunciation (or recording) of the text word when selected for playback by the system user. (Col. 5, lines 12-14). Coughlin does NOT teach a means for "representing the pronunciation of the correspondence text entry" as does the present invention. In addition, Coughlin does not disclose or teach the working of the sound portion.

A phoneme, or phonetic entry, is a guide to pronunciation and not the actual audio recording of the text. A phoneme is an abstract representation used in a phonetic system of a language that corresponds to a similar speech sound which is perceived to be a single distinctive sound of a basic speech unit in the language. For example, in English, the text "au" may be represented by

the phoneme "OW." The phoneme represents the sound that is made by a speaker when pronouncing the text, not the actual sound of the text. Coughlin does not teach a "correspondence phoneme entry representing the pronunciation of the correspondence text" of the correspondence table; nor does Coughlin teach, in any manner, the use of phonemes. On the contrary, Coughlin, finding a pronunciation guide to be inadequate, teaches away from the use of a phonetic guide. (Table, Col. 5, lines 12-4). Coughlin further states that a "pronunciation guide is not usually very helpful to the typical reader." (Col. 4, lines 43-44). Therefore, Coughlin does not teach a pronunciation guide and, thus, does not anticipate the present invention.

Furthermore, claim 34 (as amended) recites "a correspondence table . . . comprising: a plurality of correspondence sets, each correspondence set including: a correspondence text entry; a correspondence phoneme entry representing the pronunciation of the correspondence text entry; and a correspondence symbol identifying the correspondence set." This limitation is supported in the Specification on page 6, lines 11-15 as follows:

"[c]orrespondence table 240 lists phoneme entries and text entries . . . . A text entry, a phoneme entry and a symbol together form a correspondence set, and a plurality of correspondence sets forms correspondence table 240." In addition, the present invention teaches that: "[c]orrespondence table 240 preferably includes correspondence sets for most practical combinations of correspondence text and phonemes in a given language." (page 6, lines 18-20).

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Coughlin does NOT teach a correspondence table that includes the correspondence text and phoneme entries that “enable compression of a pronunciation dictionary.” Furthermore, Coughlin teaches away from the use of a correspondence table. (Col. 4, lines 41-45). Therefore, Coughlin does not teach a correspondence table of text entries and phoneme entries and, thus, does not anticipate the present invention.

Claim 34 is also distinguishable over Coughlin where it recites “a correspondence table which enables compression of a pronunciation dictionary.” This limitation is supported in the Specification on page 6, lines 23-26 as follows: “a tuning function 260 facilitates eliminating the less useful correspondence sets from, and adding more useful correspondence sets to, correspondence table 240.” Further, “tuning function 260 . . . [is used] to compress at least a portion of pronunciation dictionary 210 . . .” (page 11, lines 4-6). In contrast, Coughlin does NOT teach or disclose, in any manner, the compression or optimization of a pronunciation guide.

Finally, claim 34 recites “a correspondence symbol identifying the correspondence set.” This limitation is supported in the Specification on page 6, lines 11-17 as follows: “[e]ach correspondence set includes an identifier, referred to as a correspondence symbol, which may be simply the address of the set in correspondence table 240.” The present invention uses the correspondence symbol to identify the phoneme for a given text entry. (page 7, lines 12-15).

Coughlin, in contrast, discloses "address data [which gives] the address where the set of data for each text word is located in the compact disc (CD ROM)." (Col. 5, lines 34-36). Thus, the address data is the address of the dictionary entry, not an identifier to a correspondence set entry as in the present invention. Therefore, Coughlin's address data does not anticipate the correspondence symbol of the present invention.

In view of the above remarks, Applicant respectfully contends that the rejection of claim 34 (and, by extension, claims 35-53) on all of the grounds set forth is fully traversed and overcome, and should be withdrawn, and that the continuing Application is in condition for allowance.

Respectfully submitted,  
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Dated: 10/8/98

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